



Smart Step Recruitment
Be More...

PRIVACY NOTICE

Smart Step Recruitment Limited & Smart Step Services

GDPR

- What information we collect?
 - Why we do this?
- What we use it for?

So, who are we.....

Rachel Johnston

A handwritten signature in black ink, appearing to read 'Rachel Johnston'.

Director & Founder of Smart Step Recruitment Limited & Smart Step Services
rachel@smartsteprecruitment.co.uk
www.smartsteprecruitment.co.uk
0203 355 4480

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Registered I England and Wales. Company Registration No. 11064882. VAT Registration No.
252313244. Registered with the **ICO** – Information Commissioner's Office. ico.org.uk

Reg office: Smart Step Recruitment Ltd, 1 rookery House, Grove Farm, Crookham Village, GU51 5RX

PRIVACY NOTICE

What is our Privacy Policy?

Who we are

"At Smart Step Recruitment Limited, we are committed to maintaining the trust and confidence of our visitors to our web site. In particular, we want you to know that Smart Step Recruitment is not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes. We just don't do that sort of thing. But just in case you don't believe us, in this Privacy Policy, we've provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure. Grab a cuppa and read on."

Types of data we collect

[What is our Privacy Policy?](#)

SMART STEP CANDIDATE AND CLIENT PRIVACY POLICY

Smart Step Recruitment Limited is a company registered in England and Wales which is a recruitment agency / employment agency / Services (collectively referred to as "SSR" or "Smart Step" or "SSRLTD", "we" or "us" in this policy). Also Trading as "Smart Step Services". This notice applies to current and former employees, workers, subcontractors, and candidates seeking permanent roles with SSR clients. References in this notice to "you" or "your" refer data of the individual's engaged by the Limited Company Contractor. This notice does not confer, imply, or create any direct contractual relationship between Smart Step Recruitment Ltd and any individual engaged or employed by the Limited Company Contractor.

This notice does not form part of any contract of employment or other contract to provide services.

We may update this notice at any time.

OVERVIEW

Maintaining the security of your data is a priority at Smart Step, and we are committed to respecting your privacy rights. We always pledge to handle your data fairly and legally. SSR is also dedicated to being transparent about what data we collect about you and how we use it.

This policy, which applies whether you visit our office, use your mobile device, or go online, provides you with information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

Wifi

If you use our wifi in our offices.

When you use [SMART STEP RECRUITMENT](#) or [SMART STEP SERVICES](#) Wi-Fi we **DO NOT** collect data about:

- a) your device;
- b) the volume of data which you use;
- c) the websites and applications which you access; and
- d) your usage by access time, frequency, and location.

Mailing Lists

As part of the registration process for recruitment, we collect personal information such as name, telephone number and email address. We collect information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied.

WE DON'T TRADE OR RENT EMAIL LISTS WITH OTHER ORGANISATIONS AND BUSINESSES.

THE CLIENT

- This is for sending CV's to Client, Terms of Business (legal documentation) and invoices. Also, some clients prefer to be contacted on their work mobiles or Personal mobiles, which they will advise. This is added to their profile (*Under preferred method of contact*).

On rare occasions we send competitions and eShots which is in a JPEG or PDF format, but if the client wishes not to receive them we add them to my non-marketing list.

THE CANDIDATE

- Smart Step use candidates email addresses to send them interview confirmation and job specifications, we contact the candidates via telephone number and where the candidates give us the authority we will text (SMS) them, due to them not being contactable any other way and in some cases, candidates advise us to email them.

Information we collect from candidates during or after placement is made:

- NI Number
- Full home address including post code
- Email address
- Phone number inc; mobile
- D.O.B inc; Gender – on some occasion's photographs
- Reference details

N.B BANK ACCOUNT DETAILS - Smart Step Recruitment **DO NOT** hold bank account details or information as we are not a Temporary Recruitment agency. If for any reason a candidate is self-employed, and they do a contract role and Smart Step Recruitment have to pay them direct then we ask for an invoice to be raised (under their company) which is destroyed after payment is made. Salary, annual leave and pension information for employees only.

If you want to unsubscribe to general mailings at any time of the day or night by emailing our data protection officer [Rachel Johnston – info@smartsteprecruitment.co.uk](mailto:info@smartsteprecruitment.co.uk)

Website Cookies – Google Analytics

"When someone visits www.smartsteprecruitment.co.uk we use a third-party service, Google Analytics, 123-Reg, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website."

Information about criminal convictions

We may only use information relations to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interested (or someone else's interests) and you are not capable of giving your consent, or where you have already made information public.

How is your personal information collected?

We typically collect personal information about employees, workers and sub-contractors through the application, recruitment or engagement process, either directly from individuals or sometimes from our client background check provider (ie Simplicity In Business Limited). We sometimes collect additional information from third parties including former employers, credit reference agencies or other background checks agencies. We also collect your information from CV Libraries and job boards.

We collect additional personal information during the services you provide to us throughout the period of you providing services to us.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special Categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made information public. We may also process such information about members or former members on the course of legitimate business activities with the appropriate safeguards.

DO WE NEED YOUR CONSENT?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware this is not a condition of your contract with us that you agree to any request for consent from us.

Third Parties

"We may share anonymised personal information with other organisations, particularly Within Motor Trade or Commercial companies England, who use this to set up interviews and see you work history for future employment."

We also use a company called "**Simplicity**" also known as "**Simplicity in Business**" trading as "**Keen Thinking Limited**". *Simplicity has earned a reputation for being the UK's most innovative and fastest growing specialist provider of outsourced back office and financial solutions to the recruitment sector.* We use them for invoice payments, their databases are GDPR approved, and more information can be found at <https://www.simplicityinbusiness.co.uk/>

Smart Step Recruitment **NEVER** send your CV or personal information without your say so first, you will know where we are sending you to as you will have the job specification, or you would have asked to be spec'd to the said client / Company.

"We will let them know about you and share your name and contact details with them, but they can't contact you unless you have agreed at interview or accepted employment from them. We will not share sensitive information without your authority."

Changes to the policy notice

Created **1st May 2018** by Rachel Julia Johnston – DPO

- To be reviewed / updated September 2026 – 10 years after trading as **Smart Step Recruitment & Smart Step Services**
- Last Date of Review: **20th September 2025**

Access to your personal information

Under GDPR, the data subject has the right to access and amend any of their personal data that we hold. To do this please see below:

You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer [Rachel Johnston] email [\[info@smartsteprecruitment.co.uk\]](mailto:info@smartsteprecruitment.co.uk)

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purpose identified.

Consent is required for **Smart Step Recruitment Limited** to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information is used.

Disclosure

Smart Step Recruitment Limited *[will not]* pass on your personal data to third parties *[without first obtaining your consent]*.

[The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:]

Organisation Name & Geographic location	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place
Smart Step Recruitment Ltd & Smart Step Services	As above – DPO Rachel Johnston Croydon CR0 4HA	info@smartsteprecruitment.co.uk
Simplicity in Business Ltd – Gloucestershire GL17 0DD	GEMS Data Base – Information stored for invoicing purposes	https://www.simplicityinbusiness.co.uk/privacy-policy/
Motor Trade Main dealerships and Garages Nationwide	All personal data taken off before sending to client this is only provided once you have accepted job the offer.	N/A
Commercial industries Nationwide	All personal data taken off before sending to client this is only provided once you have accepted job the offer.	N/A

Consent / Signing

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purpose identified.

☐ I HERE BY UNDERSTOOD AND READ YOUR DATA POLICY NOTICE AND AGREE TO BE CONTACTED BY THE RELEVANT PARTIES AS STATED.

☐ I WOULD LIKE TO RECEIVE EMAIL UPDATES AND INFORMATION FROM SMART STEP RECRUITMENT. PLEASE REFER TO OUR [PRIVACY POLICY](#) FOR MORE INFORMATION ABOUT HOW WE COLLECT, STORE AND HANDLE YOUR PERSONAL DATA.

NAME: _____ SIGNATURE: _____ DATE: _____